

August 6, 2002

HP Ex Parte

Exhibit B

Colorado En Banc Hearing 6/10/02

Transcript Excerpt



1 BEFORE THE PUBLIC UTILITIES COMMISSION
2 OF THE STATE OF COLORADO
3 Docket No. 02M-260T
4 * * *
5 IN THE MATTER OF THE COLORADO PUBLIC UTILITIES
6 COMMISSION'S RECOMMENDATION TO THE FEDERAL
7 COMMUNICATIONS COMMISSION REGARDING QWEST
8 CORPORATION'S PROVISION OF IN-REGION, INTERLATA
9 SERVICES IN COLORADO.

2

1 P R O C E E D I N G S
2 CHAIRMAN GIFFORD: Good morning,
3 everyone. We'll call Docket 02M-260T. We are here
4 this morning for workshops concerning the ROC OSS test
5 and data reconciliation.
6 We'll begin the morning by taking
7 entries of appearance, starting to my left.

3

17 MR. DIXON: Thomas Dixon appearing on
18 behalf of WorldCom and its regulated subsidiaries.

 [BY MR. DIXON:] 94

18 Q. Did HP find that Qwest's documentation
19 was complete for preorder to order integration?

20 A. (MR. PETRY) Our results are documented in
21 either observations, exceptions, or our reports.

22 Q. Now, are you familiar with the concept of
23 parsing, p-a-r-s-i-n-g?

24 A. (MR. PETRY) Yes, I am.

25 Q. Why don't you describe for the record

1 what role it might play in the preorder-order
2 integration process if any.

3 A. (MR. PETRY) Parsing is the term used to
4 describe a process by which you may take a large amount
5 of typically relatively -- or seemingly unstructured
6 data and break it down into component pieces that you
7 can then work with them on a field type of level.

8 Qwest provides in their EDI interface a
9 customer service request, a CSR; the response to that,
10 via EDI, comes back as a parsed CSR, meaning the data
11 comes back broken out so that this is a -- this is the
12 individual field. You may get a universal service
13 order code or USOC that identifies your feature, Call
14 forwarding, Call-waiting; the additional details on
15 that, so it does come back in a parsed format.

16 What Mr. Dixon is referring to is then
17 taking that individual -- those individual data fields
18 and needing to map them into a subsequent order that
19 you are submitting for that customer.

20 HP did do analysis work and development
21 work for CSR taking a parsed CSR response back and
22 mapping it back to a limited number of products and
23 services with Qwest. However we did not use that
24 functionality when conducting the Master Test Plan Test
25 12, due to the test design. We took -- had a different

1 approach, but we did conduct that analysis and that
2 actual development in implementation.

3 Q. And maybe just to wrap it up in one
4 respect, what is the different approach that HP took?

5 A. (MR. PETRY) The second approach -- the
6 other approach that HP took, due to the design of the
7 test, was similar to what CLECs would do -- may do, is
8 we created ordering templates based upon a product. If
9 you were ordering a resale plain old telephone service,
10 POTS-type line, we built a template for what that order
11 would like for that type of service. If we were going
12 to be doing Centrex, we had a template that was for a
13 Centrex type of order. And based upon those type of
14 activities, when you were converting or doing a new
15 installation and -- that is the approach we actually
16 used in Test 12.

17 Q. Did the Pseudo-CLEC use any preorder
18 information provided by KPMG in its sales and marketing
19 role?

20 A. (MR. PETRY) KP -- no. KPMG submitted the
21 orders over to us, identifying very basic information
22 as to, this is the account, whether it was a telephone
23 number or an address; if it was for, say, new service
24 installation. What the test case was that we had a
25 reference point as to what type of order this would be;

1 and -- but, no, we did not use any preorder information
2 provided by KPMG. We started with an address
3 validation query and pulled all of the related preorder
4 activity necessary to submit an order.

5 Q. Mr. Crain asked you to refer to a section
6 in the report. I would like to just discuss the report
7 you did in Arizona for minute, if I might -- and by
8 you, I mean your company, not the two of you
9 individually. Are you familiar with the report issued
10 in Arizona that dealt with preorder to order
11 integration? It was identified as Version 4.0 and it
12 was issued on -- actually carries a release date of
13 March 28, 2002.

14 A. (MR. MAY) We, we are.

15 MR. DIXON: All right, if I may approach
16 the panel.

17 A. (MR. PETRY) Mr. Dixon, for the record,
18 though, as we stated before, the ROC team was in the
19 involved in the development or the production of that
20 report.

21 So our comments are just based upon a
22 cursory . . .

23 Q. I presume cursory review of that document
24 is what you wanted to end with.

25 A. (MR. PETRY) Yes, I was waiting to see

1 if --

2 Q. First of all, just for the record, let me
3 provide you with an electronic version of the document
4 I have before me; it's entitled, Preorder to order
5 integration report for 271 test generator Arizona
6 Corporation Commission; and then I'll refer to the
7 bottom which reflects that it is Final Version 4.0,
8 release date 3/28/02. And it carries the name HP on
9 the cover page. Do you see first what I'm referring
10 to?

11 A. (MR. PETRY) Yes.

12 A. (MR. MAY) Yes.

13 Q. Have you had an opportunity to look at
14 this report at least in some fashion before?

15 A. (MR. PETRY) Not prior to the Washington
16 hearing.

17 Q. And the Washington hearing did in fact
18 occur before this hearing.

19 A. (MR. PETRY) That is correct.

20 Q. So that might have been your first
21 introduction to this report was in the state of
22 Washington?

23 A. (MR. PETRY) Correct.

24 Q. I'm going to ask you to focus for a
25 moment on page 8 of that report.

1 MR. CRAIN: And I guess I would object
2 that -- to the extent we don't have the copy of the
3 report in the record and copies of those -- that report
4 to look at today. I'm going to object to him referring
5 to something on the computer.

6 MR. DIXON: Your Honor, the report
7 contains what appears to be a professional opinion of
8 the company. I want them to it read into the record
9 and ask them if they agree with it. If Qwest wishes to
10 put the report in the record, I have no objection.

11 CHAIRMAN GIFFORD: I'll overrule the
12 objection for now. Why don't you proceed, Mr. Dixon;
13 and if we need to get the full report in the record, we
14 can certainly allow for that.

15 MR. DIXON: Thank you.

16 What I've done is highlight in yellow a
17 paragraph. I would ask either of you to read that out
18 loud into the record slowly and then I'll ask you my
19 last question.?

20 A. (MR. MAY) Okay reading from that report
21 and the selected paragraph: It is HP's professional
22 opinion based upon its review of Qwest documentation
23 that a CSR to LSC parsing would be a somewhat
24 challenging and complex undertaking for a CLEC with an
25 information technology team that was not experienced in

1 EDI development. Other alternatives would be to
2 contract the development of the EDI interface through a
3 service bureau or purchase a third-party solution from
4 a vendor such as Telcordia. There will be a number of
5 issues that will have to be clarified by meetings with
6 Qwest. However a CLEC with the appropriate resources,
7 funding, time, and planning activities can build a CSR
8 to LSR parsing interface.

9 Q. Do you have any more -- do either of you
10 have any reason to want to look at this report because
11 I have one final question and I'll leave you.

12 A. (MR. MAY) No.

13 Q. Thank you.

14 Gentlemen, based on HP's evaluation of
15 preorder to order integration in the ROC test do you
16 agree with the opinion you just read into the record
17 from the Arizona report?

18 A. (MR. PETRY) We would agree with that
19 paragraph.

August 6, 2002

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Exhibit C

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Transcript Excerpt



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2 OF THE STATE OF COLORADO
3 Docket No. 02M-260T
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1 P R O C E E D I N G S
2 CHAIRMAN GIFFORD: Good morning,
3 everyone. We'll call Docket 02M-260T. We are here
4 this morning for workshops concerning the ROC OSS test
5 and data reconciliation.
6 We'll begin the morning by taking
7 entries of appearance, starting to my left.
8 Mr. Crain or Ms. Ciccolo?
9 MS. CICCOLO: Good morning,
10 Mr. Chairman, Commissioners. Kris Ciccolo and Andrew
11 Crain appearing on behalf of Qwest.

[BY MR. CRAIN:]

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20 Q Regarding integration, Mr. Dixon asked
21 you about the opinion of the test years in Arizona.
22 Building an EDI interface is a fairly complex task;
23 isn't that correct?

24 A (by Mr. Petry) Yes.

25 Q It's something that you wouldn't

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1 expect someone like me without experience to wake
2 up one morning and say, I think I'll build an EDI
3 interface today but you would expect someone with
4 some experience to be doing that?

5 A That is correct. If you want it to be
6 successful.

7 Q I believe Mr. Dixon read the
8 opinion of the Arizona HP team and it stated, and I'm
9 paraphrasing because I don't have it in front of me,
10 that HP finds that a CLEC with the appropriate
11 experience can build an integrated interface using
12 Qwest part CSR. Is that essentially your opinion
13 as well?

14 A That was, I believe, the concluding
15 statement of that paragraph.

16 Q You agreed with that?

17 A Yes, I did.

**CONFIDENTIAL REPLY EXHIBIT LN-1
FOR PUBLIC INSPECTION
ATTACHMENT A6**

WorldCom's Experience with CSR Feature Identification Issues

[REDACTED]

CONFIDENTIAL REPLY EXHIBIT LN-1
ATTACHMENT A7
For Public Inspection

Excerpt from Closed Qwest Post-Launch Issues Log, Stare and Compare Section, Issue 4

A. Stare & Compare	Raised By/Date	Issue/Question	Owner	Resolution/Answer	Status

[2 pages redacted]

Excerpt from Closed Qwest Post-Launch Issues Log, Address Validation Section, Issues 7-16

[6 pages redacted]

[illegible]

**CONFIDENTIAL REPLY EXHIBIT LN-1
FOR PUBLIC INSPECTION
ATTACHMENT A9**

LSR Examples Fo Submitting Supplemental Orders

[45 PAGES REDACTED]

**CONFIDENTIAL REPLY EXHIBIT LN-1
ATTACHMENT A10
For Public Inspection**

Excerpt from Open WorldCom Question Log, Customer Code Section, Issue 2

[2 pages redacted]

Cust Code	Raised By/Date	Issue/Question	Owner	Resolution/Answer	Status

ATTACHMENT A11



IT Wholesale Systems Help Desk

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest IT Wholesale Systems Help Desk
Date: 04/03/03
Subject: System Event Notification

☐ Initial☒ Update☐ Closure

This Event Notification is sent to advise you that Qwest had experienced trouble with the below system:

PCRM Ticket Number: 6195261

ISC Ticket Number:

Event Onset

Time: 2:00 MTN

☐ AM ☒ PM

Date: 04/02/03

System/Application:

Ticket Severity: 3

Description of Trouble: On several Pay Per Use features, CLECs may receive incorrect CLASS Feature Codes on the DUF. CLECs may receive CLASS Feature DUF records that do not contain all of the available CLASS Feature Codes as defined by Telcordia Technologies for AMA recordings.

Business Impact: CLECs may receive incorrect CLASS Feature Codes on the DUF.

Qwest Proposed Work Around: None required.

IMA-GUI	<input type="checkbox"/>
IMA-EDI	<input type="checkbox"/>
TELIS/EXACT	<input type="checkbox"/>
E-Commerce Gateway	<input type="checkbox"/>
CEMR	<input type="checkbox"/>
Resale Product Database	<input type="checkbox"/>
MEDIACC	<input type="checkbox"/>
Other: CRIS	<input checked="" type="checkbox"/>

Client Region:

Eastern	<input type="checkbox"/>
Central	<input checked="" type="checkbox"/>
Western	<input type="checkbox"/>
All Regions	<input type="checkbox"/>

Estimated resolution Time: xx:xx MTN ☐ AM ☐ PM Date:

Event Closure Resolution:

Time: XX:XX MTN

☐ AM ☐ PM

Date:

☐ System Event Notification has been closed.

Escalation:

Additional questions may be directed to the Qwest IT Wholesale Systems Help Desk at 1-888-796-9102, Option 3.

ATTACHMENT A12



IT Wholesale Systems Help Desk

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest IT Wholesale Systems Help Desk
Date: 04/02/03
Subject: System Event Notification

☒ Initial☐ Update☒ Closure

This Event Notification is sent to advise you that Qwest had experienced trouble with the below system:

PCRM Ticket Number: 6195278

ISC Ticket Number:

Ticket Severity: 3

Event Onset

Description of Trouble: CLEC may receive EMI record type 100119 for "I-Called" record pay per use feature instead of record type 100118.

Time: 2:00 MTN

Business Impact: CLEC may receive EMI record type 100119 for "I-Called" record pay per use feature instead of record type 100118.

☐ AM ☒ PM

Date: 04/02/03

Qwest Proposed Work Around: None required. Record type for "I-Called" record pay per use feature should be considered 100118 in all instances.

System/Application:

IMA-GUI	<input type="checkbox"/>
IMA-EDI	<input type="checkbox"/>
TELIS/EXACT	<input type="checkbox"/>
E-Commerce Gateway	<input type="checkbox"/>
CEMR	<input type="checkbox"/>
Resale Product Database	<input type="checkbox"/>
MEDIACC	<input type="checkbox"/>
Other: CRIS	<input checked="" type="checkbox"/>

Client Region:

Eastern	<input checked="" type="checkbox"/>
Central	<input type="checkbox"/>
Western	<input type="checkbox"/>
All Regions	<input type="checkbox"/>

Estimated resolution Time: MTN ☐ AM ☐ PM Date: TBD

Event Closure Resolution: Trouble to be resolved in patch – Date TBD

Time: 2:00 MTN

☐ AM ☒ PM

Date: 13:30

☒ System Event Notification has been closed.

Escalation:

Additional questions may be directed to the Qwest IT Wholesale Systems Help Desk at 1-888-796-9102, Option 3.

ATTACHMENT A13



Announcement Date: March 12, 2003
Effective Date: March 13, 2003

Document Number: PROD.03.12.03.F.03339.UNE_P_Resale&UBS
Notification Category: Product Notification
Target Audience: CLECs

Subject: CMP – Unbundled Network Elements-Platform (UNE-P) – General Information V27.0, Resale – General -V24.0, Unbundled Network Element-Switching (UBS)- V16.0

Level of Change: Level 1
Associated CR Number or System Release Number: Qwest # PC022403-1EX

Summary of Change:

On March 13, 2003 Qwest will post updates to its Wholesale Product Catalog that include corrections, clarifications and additional information for documents identified above.

On February 24, 2003, a Level 3 Product Notification, PROD.02.24.03.F.03321.UNE_P_Resale&UBS, was submitted to modify/change an existing manual process. The proposed updates were associated with existing Retail accounts with "Microsoft Network (MSN) Internet Access Powered by Qwest" Narrowband dial-up billing arrangements converting to UNE-P, UBS, and Resale services. On February 24, 2003, Qwest submitted an exception Change Request to request implementation of this proposed change using the Level 1 notification timeframes instead of the level 3 timeframes. Please reference Change Management notification CMPR.02.25.03.F.01429.ExcepReqPreMtg for additional details in regard to this exception Change Request. On March 11, 2003, Qwest conducted a meeting where the CLEC community voted and approved this change to follow the level 1 timeframes allowing an earlier implementation of the process. The results of this Exception Vote are documented in Change Management Notification CMPR.03.12.03.F.01444.ExcepReqVoteDisp.

Based on the results of the vote taken March 11, 2003, Qwest is issuing this Level 1 notification. Updates have been made in Unbundled Network Elements-Platform (UNE-P) – General Information V27.0, Resale General – V24.0 and Unbundled Network Element-Switching (UBS)- V16.0 in the Terms and Conditions section. The change describes the processes associated with existing Retail accounts with "Microsoft Network (MSN) Internet Access Powered by Qwest" Narrowband dial-up billing arrangements converting to UNE-P, UBS, and Resale services.

You will find a redlined version of the changes on the Product/Process Document Review Archive at http://www.qwest.com/wholesale/cmp/review_archive.html. Actual updates to the operational document are found on the Qwest Wholesale Web Site at the following URLs:
<http://www.qwest.com/wholesale/pcat/unep.html>
<http://www.qwest.com/wholesale/pcat/resalegeneral.html>
<http://www.qwest.com/wholesale/pcat/unswitch.html>

Note: In cases of conflict between the changes implemented through this notification and any CLEC Interconnection Agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such Interconnection Agreement shall prevail as between Qwest and the CLEC party to such Interconnection Agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.



Comment Cycle:

No formal comment cycle applies. CLECs who feel the change(s) described in this Level 1 notification alter(s) CLEC operating procedures should immediately contact the Qwest CMP Manager, by e-mail, at cmpcr@qwest.com.

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC Interconnection Agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such Interconnection Agreement shall prevail as between Qwest and the CLEC party to such Interconnection Agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

**CONFIDENTIAL REPLY EXHIBIT LN-1
FOR PUBLIC INSPECTION
ATTACHMENT A14**

**WorldCom LSRs Received Subject to Special ISP Billing Arrangements
Between March 17, 2003, to March 31, 2003**

[REDACTED]



Qwest
1020 Nineteenth Street NW, Suite 700
Washington, DC 20036
Phone 202.429.3120
Facsimile 202.293.0561

Melissa E. Newman
Vice President-Federal Regulatory

April 11B, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 03-11 - Application by Qwest Communications
International Inc. for Authority to Provide In-Region InterLATA
Services in New Mexico, Oregon and South Dakota**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this letter at the request of Commission staff to respond to AT&T's *ex parte* submission regarding reject rates.¹

AT&T claims that it has recently experienced an increase in reject rates for orders placed via its EDI interface.² As explained more fully below, none of the information AT&T has provided prevents this Commission from finding that Qwest's OSS meets the requirements of Section 271.

This is the first time AT&T has raised the issue of reject rates in this proceeding. This alone should place these allegations into context, as AT&T has had multiple opportunities to express its views in this proceeding but has waited until now – a mere four days before the Commission is required by law to act – to raise its reject-related concerns. Also significant is that AT&T has not expressed any concern over its reject rates in its regular meetings with Qwest, which have been ongoing since earlier this calendar year.³

AT&T does not provide any information that explains what Qwest may have done to affect AT&T's reject rates. The closest AT&T comes to providing a reason for its rejects is its

¹ See AT&T April 10, 2003, Ex Parte, WC Docket No. 03-11 (April 10, 2003), as modified by AT&T April 11, 2003, Ex Parte Erratum, WC Docket No. 03-11 (April 11, 2003).

² See *id.* at 1-2.

³ AT&T and Qwest have been meeting twice a week since January of this year to discuss AT&T's concerns regarding its residential service, and have met every two weeks since February 21, 2003, to discuss similar matters in the context of AT&T's business service. Multiple representatives from AT&T have attended each of these meetings.

Marlene H. Dortch
April 11, 2003
Page 2

statement that “[m]ost of the rejection notices that AT&T has received from Qwest in recent months state that the LSRs were rejected because the addresses on those LSRs were incorrect.”⁴ But, subsequently, AT&T acknowledges that these “[a]ddress-based rejections would not have occurred if . . . Qwest had implemented ‘telephone number migration,’” and that Qwest indeed implemented this functionality on April 7, 2003.⁵ Using AT&T’s own logic, then, the primary reason its orders have at times been rejected no longer exists.⁶

AT&T tries to make much of the fact that its reject rates for LSRs submitted via EDI between September 2002 and January 2003 increased (as a percentage of total orders) even though its total EDI order volumes decreased during this period.⁷ But this does not prove anything. AT&T does not explain what may have caused this to happen, and instead merely tries to disclaim responsibility.⁸ That AT&T cites only auto-reject increases in its filing is significant because the address edits in the Business Processing Layer, which is the point at which LSRs are auto-rejected, are straightforward.

AT&T notes that its reject rates during the Minnesota UNE-P trial were low in part because AT&T used the same address for all of its test orders.⁹ But the results of the UNE-P trial are still meaningful because the low reject rates that AT&T achieved demonstrate that it is possible to have very low reject rates associated with change order activity, including feature activity.

In the *Qwest 271 Order*, the FCC held that “[b]ecause the record demonstrates that a number of competing LECs experience low reject rates . . . it is inappropriate to attribute the wide range of reject rates to Qwest.”¹⁰ Because the record in this proceeding is comparable to the record the Commission relied on when making that statement, this same conclusion applies here. Qwest already has demonstrated that CLECs with substantial volumes of LSRs submitted via EDI have been able to achieve low reject rates.¹¹ Indeed, CLECs with over ten times the volume of the LSRs submitted by AT&T have been able to achieve reject rates of

⁴ See *id.* at 3. It is not entirely clear to Qwest why AT&T may have experienced an increase in its reject rates earlier this year. But, it is worth noting that sometime after January 1, 2003, AT&T informed Qwest that AT&T modified its OSS to retrieve address information from CSRs rather than from Qwest’s address validation tool. If this is the case, then it is understandable that AT&T experienced an increase in auto-reject rates because, as Qwest has now noted on many occasions, the appropriate source for address information is the address validation tool, PREMIS.

⁵ See *id.*, n.8.

⁶ AT&T claims that the Commission should discount Qwest’s recent implementation of Migrate-by-TN functionality because “some months of commercial experience will be required before it can be determined whether the new functionality is effective.” See *id.* at 3. But the Commission has already held that Migration-by-TN functionality is not even needed to satisfy Section 271. See *Qwest 271 Order* at ¶ 56.

⁷ See AT&T April 10 Ex Parte at 2.

⁸ See *id.* (stating that “these increased rejection rates cannot reasonably be blamed on AT&T”).

⁹ See AT&T April 10 Ex Parte at 3-4.

¹⁰ See *Qwest 271 Order* at ¶ 89.

¹¹ See Qwest April 4A, 2003, Ex Parte, WC Docket No. 03-11; Qwest Performance Declaration at ¶¶ 177-179.

Marlene H. Dortch
April 11, 2003
Page 3

between 7-15% when using EDI, well below the 27-34% range the Commission previously found acceptable in other Section 271 proceedings.¹² In short, AT&T's *ex parte* does not provide any information to prevent this Commission from finding that Qwest's OSS satisfies the requirements of Section 271.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

/s/

Melissa Newman

cc: K. Cook
W. Dever
G. Remondino
J. Myles
K. Brown
R. Harsch
H. Best
D. Booth
K. Cremer
A. Medeiros
R. Weist

¹² See, e.g., *Qwest 271 Order* at ¶ 89, n.316, citing *Bell Atlantic New York Order*, 15 FCC Rcd 3953, 4044, n.552 (1999).